

### REMARKS

Claims 8 to 11, 19 to 22 and 29 to 51 are pending in the application, of which claims 8, 19 and 29 are independent. Favorable reconsideration and further examination are respectfully requested.

In the Office Action, Figs. 1 and 2 were objected to under 37 C.F.R. 1.83(a). As shown above, Figs. 1 and 2 have been amended, as requested in the Office Action. Withdrawal of the objection is therefore respectfully requested.

Figure 10 was objected to for showing a silhouette edge 65 between endpoints 62 and 64, while simultaneously showing the vector 66 to the silhouette edge drawn on the same line on the same plane as edge 65. Examiner contends that "this cannot be [since] a normal must be perpendicular." As shown above, Applicants have amended the specification to remove the descriptor "normal" from vector 66. This clarification is believed to address any inconsistencies in terminology. Also, as requested on page 2 of the Office Action, Applicants have re-oriented Fig. 10 so that the height vector is vertical and the width vector is horizontal.

In view of the above clarifications and amendments, reconsideration and withdrawal of the drawing objections are respectfully requested.

Claims 8 to 11, 19 to 22 and 29 to 51 were rejected under the first paragraph of 35 U.S.C. § 112 for failing to comply with the enablement requirement; and claims 10, 21, 30 and 31 were rejected under the second paragraph of 35 U.S.C. § 112 for alleged indefiniteness. As shown above, Applicants have amended the claims to define the invention with greater clarity. In view of these clarifications, withdrawal of the rejections is respectfully requested.

Amended independent claim 8 defines a method of applying a texture map to render a silhouette edge. The method includes determining a structure of a texture map area based on an eyepoint vector to the silhouette edge and applying a texture map to the texture map area to render the silhouette edge. The method further specifies that the texture map area has a width and a height, and the structure of the texture map area is determined so that the width is orthogonal to the eyepoint vector and to the height.

On page 3, paragraph 2 of the Office Action, the Examiner states that "it is unclear how the size of the texture map is determined based on an eyepoint vector." Applicants have amended claim 8 to clarify that it is the "structure" of the texture map that is being determined based on an eyepoint vector. In this regard, Applicants direct the Examiner to page 9, lines 4-10 of the amended specification which states that "the cross product of vector 66 and eyepoint vector 67... produces a width vector 69, which defines *the direction* of the width of the texture map" (emphasis added). This direction, as partially based on the eyepoint vector, helps to position the "four map points." These four map points, in return, define the structure of the texture map.

Examiner further states, on pages 3-4 of the Office Action, that "it is not known what is the magnitude of the normal height vector 66... [a]dditionally, the specification does not explain how the 'size of a texture map' is determined." Applicants respectfully direct the Examiner to page 9, lines 15-17 of the specification, which states that the "size [of the texture map area] may be pre-set, or... controlled by a computer animator via a graphical user interface." So, for example, in one implementation, the magnitude of the normal vector may be preset (page 9, lines 1-2, Specification) in a direction of vector 69.

For at least the foregoing reasons, Applicants respectfully request withdrawal of the rejections to claim 8. Amended independent claims 19 and 29 are article of manufacture and apparatus claims that correspond, roughly, to claim 8. The rejections to these claims are also believed to be overcome in view of the foregoing amendments and remarks.

Amended claim 10 is directed to a method in which the structure of the texture map area is determined by constructing a vector relative to the silhouette edge. The method includes determining a cross product of the vector and the eyepoint vector to determine a direction of the width of the texture map area, and defining the texture map area based on points that are positioned relative to end points of the silhouette edge along the direction of the width.

On page 4 of the Office Action, Examiner states that "it appears from Fig. 10 that the silhouette edge 65 is on the same plane as the texture map, so the normal to the edge 65 is the same as the normal to the texture map." Examiner then concludes that,

[c]laim 10's cross product between the normal to edge 65 and eyepoint vector orthogonal to the texture map would be meaningless because these vector are in the same direction...  
[t]herefore, the claim limitation, as recited, does not make sense as it would appear to always create a result of 0.

As discussed above, vector 66 has been re-labeled to address what may have been confusing terminology. The location of vector 66 is correct as shown in Fig. 10. As such, a cross product of vector 66 and eyepoint vector 67 would not be zero. Instead, it would be in the direction of vector 69, as explained in the specification.

For at least the foregoing reasons, the rejection of claim 10 is believed to be overcome. Amended claims 21 and 30 are article of manufacture and apparatus claims that correspond,

roughly, to claim 10. The rejection of these claims is believed to be overcome for at least the same reasons as noted above with respect to claim 10.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the foregoing amendments and remarks, Applicants respectfully submit that the application is in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney can be reached at the address shown below. All telephone calls should be directed to the undersigned at 617-368-2158.

Applicants : Adam T. Lake, et al.  
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Respectfully submitted,

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Ruth J. Ma

Ruth J. Ma  
Reg. No. 55,414

ATTORNEYS FOR INTEL  
Fish & Richardson P.C.  
225 Franklin Street  
Boston, MA 02110-2804  
Telephone: (617) 542-5070  
Facsimile: (617) 542-8906